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UNITED STATES OF AMERICA
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13 UNITED STATES DISTRICT COURT

14 FOR THE CENTRAL DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 KIMBERLY ANN MILETTA,

19 Defendant.
20
21

No. CR 22-195-MEMF

GOVERNMENT'S EX PARTE
APPLICATION FOR ORDER PERMITTING
GOVERNMENT TO FILE EXHIBITS 1-8
TO OPPOSITION TO DEFENDANT'S
MOTION TO DISMISS THE INDICTMENT
UNDER SEAL, DECLARATION OF JENNA
WILLIAMS

22 Respondent United States of America, by and through its counsel
23 of record, the United States Attorney for the Central District of
24 California and Assistant United States Attorney Jenna Williams,
25 hereby applies ex parte for an order of the Court permitting the
26 government to file under seal Exhibits 1-8 to its Opposition to
27 Defendant's Motion to Dismiss the Indictment.
28

1 This ex parte application is based on the attached Declaration
2 of Jenna Williams.

3 If the application is denied, the government requests that the
4 underlying documents shall be returned to the government, without
5 filing of the documents on the clerk's public docket.

6 Dated: January 19, 2024

Respectfully submitted,

7 E. MARTIN ESTRADA
8 United States Attorney

9 MACK E. JENKINS
10 Assistant United States Attorney
11 Chief, Criminal Division

12 /s/
13 _____
14 JENNA WILLIAMS
15 Assistant United States Attorney

16 Attorneys for Plaintiff
17 UNITED STATES OF AMERICA
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DECLARATION OF JENNA WILLIAMS

I, Jenna Williams, declare and state as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I am one of the attorneys representing the United States of America in the above-captioned case.

2. This declaration is made in support of the government's ex parte application for an order permitting the government to file under seal Exhibits 1-8 to its Opposition to Defendant's Motion to Dismiss the Indictment.

3. The government seeks permission to file Exhibits 1-8 under seal because they involve documents that include victim information that was produced pursuant to the Protective Order in this case (Dkt. 8) and/or which were filed under seal, and remain under seal, in the underlying equitable civil action, In re Seizure of Data and Documents, 21-CV-03529-CBM, involving the Rule 41 motion that is the subject of defendant's Motion to Dismiss.

4. I have consulted with defendant's attorney, H. Dean Steward, and he does not object to the filing of Exhibits 1-8 under seal.

5. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: January 19, 2024

/s/

JENNA WILLIAMS

Assistant United States Attorney

CERTIFICATE OF SERVICE

I, **Teresa H. Terrell**, declare:

That I am a citizen of the United States and a resident of or employed in Los Angeles County, California; that my business address is the Office of United States Attorney, 312 North Spring Street, Los Angeles, California 90012; that I am over the age of 18; and that I am not a party to the above-titled action;

That I am employed by the United States Attorney for the Central District of California, who is a member of the Bar of the United States District Court for the Central District of California, at whose direction I served a copy of:

**GOVERNMENT'S *EX PARTE* APPLICATION FOR ORDER SEALING DOCUMENT;
DECLARATION OF JENNA WILLIAMS; [PROPOSED] ORDER SEALING DOCUMENT;
UNDER SEAL DOCUMENT(S)**

☐ Placed in a closed envelope for collection and inter-office delivery, addressed as follows:

☐ Placed in a sealed envelope for collection and mailing via United States certified mail, addressed as follows:

☐ By hand delivery, addressed as follows:

☐ By facsimile, as follows:

☒ Via email, as follows:

☐ By Federal Express, as follows:

deansteward7777@gmail.com

This Certificate is executed on **January 18, 2024**, at Los Angeles, California. I certify under penalty of perjury that the foregoing is true and correct.

Teresa H. Terrell

Teresa H. Terrell
Legal Assistant